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6 Robert S. Wood, Attorney for Defendants

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8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11
12 ROBERT C. OLSON AND DAPHNE L.
13 OLSON, Trustees of the Olson
14 Family Trust and as individuals,

15 Plaintiffs,

16 vs.

17 DALE BECK INDIVIDUALLY, dba
18 Geary Road Service, as Trustee
19 of the 1992 Beck Family Trust
20 and Trustee of the 1990 Beck
21 Family Trust,

22 Defendants.

Case No.: C 06-07487 JCS

STIPULATION

RE: MOTION FOR SUMMARY JUDGMENT

DATE: August 27, 2010

TIME: 9:30

23 This stipulation is a request that you continue the dates
24 regarding response to the Motion for Summary Judgment as to the
25 estates of Roberta Beck and Sandra Beck and the date for having
the reply brief. As directed by you, we had a mediation on the
15th of July 2010. There was both a lawyer and an insurance

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1 representative for the insurance company present for the entire
2 time of the mediation. The mediation lasted approximately five
3 hours and a half. The insurance company has asked that we
4 provide further documentation to them to substantiate the
5 demands of the plaintiff and the costs for further remediation
6 expressed needed by plaintiffs.

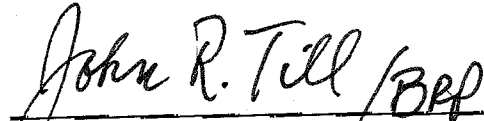
7 All the parties agreed that we would provide the insurer's
8 representatives the required information by Friday the 23rd of
9 July. The information requested by the insurance company is
10 extensive. In addition the demands of the various parties
11 require obtaining new bids to approximate the cost and further
12 cleanup, obtain permission for the city of Pleasant Hill to
13 perform the work requested by the plaintiffs and other matters.

14 Since the representative for the insurance company is in a
15 week long mediation the following week, and then the week after
16 that, they have asked to get back to us within three weeks.
17 During this internal communications will be effected through
18 Michael Foy of Gordon & Rees, the insurer's attorney.

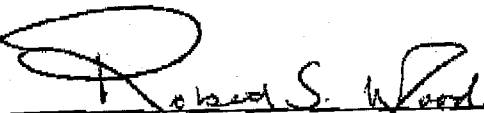
19 Since a response to plaintiff's Motion for Summary Judgment
20 and a reply brief to that is due, both Mr. Till and I have
21 agreed that it would be best if we had an extension on these
22 matters for four weeks. In this way we should be able to
23 exchange all the different documents and report requested by the
24 insurer and provide additional information if needed and then
25 /

1 /
2 set up a meeting to meet again with them in San Francisco at the
3 office of Gordon & Rees or with the mediator.

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5 DATED: July 21, 2010

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8 John R. Till
9 Paladin Law Group LLP
10 Counsel for Plaintiffs

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12 DATED: July 21, 2010

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15 Robert S. Wood
16 Law Offices of Robert S. Wood
17 Counsel for Defendants

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19 MOTION FOR SUMMARY JUDGMENT continued to September 24, 2010

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21 Opposition due by August 20, 2010

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23 Reply brief due by August 27, 2010

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25 Dated: 7/23, 2010

